

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

NAKALA MURRY, *Individually and on
behalf of her son, A.M., A MINOR*

PLAINTIFF

v.

CIVIL ACTION NO.:4:23CV97-DMB-DAS

CITY OF INDIANOLA, MISSISSIPPI: et al.

DEFENDANTS

MOTION TO WITHDRAW AS COUNSEL AND ASSERT LIEN

COMES NOW, Counsel for Plaintiff, Carlos E. Moore of the Carlos Moore Law Group (hereinafter “Counsel”) and files this *Motion to Withdraw as Counsel and Assert Lien*, and shows this Honorable Court:

1. Plaintiff and her counsel have reached an impasse on how to proceed with her case.
2. It is in Plaintiff’s best interest to seek and obtain new counsel.
3. Counsel moves to assert a Quantum Meruit Lien for the value of his services to date and for expenses reimbursement should the case settle.
4. Counsel has attached a Redacted Contract labeled as “Exhibit A”.
5. Counsel has also filed a Memorandum in Support to this Motion.

WHEREFORE, PREMISES CONSIDERED, Counsel requests that his Motion to Withdraw as Counsel be granted.

RESPECTFULLY SUBMITTED, this the 12th day of September, 2024.

CARLOS E. MOORE, COUNSEL

By: /s/ Carlos E. Moore

Carlos E. Moore, ESQ.

MS Bar No. #100685

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have this date notified by way of electronic filing system and mailed by United States Mail, postage prepaid, a true and correct copy of the above and foregoing to all counsel of record and Plaintiff's personal address as entered upon date of filing.

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This the 12th day of September, 2024

/s/ Carlos E. Moore

Carlos E. Moore, ESQ.